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February 11, 2004 T.R.A. DOCKET ROC 1

Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Loop and Transport)

Docket No 03-00527

Dear Chairman Tate

Enclosed please find the original plus fourteen (14) copies of MCImetro Access Transmission Services, Inc Brooks Fiber Communications of Tennessee, Inc and MCI WorldCom Communications, Inc (collectively "MCI") Second Supplemental Responses to BellSouth's First Set of Interrogatories in the above-referenced docket Attachments B and C to these second supplemental responses are proprietary and confidential and are included herewith in a sealed envelope

Copies have been served on all parties of record

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Jon E Hastings

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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2004, a copy of the foregoing document was served on the parties of record, via electronically, US mail or hand delivery

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BEFORE THE TENNESSEE REGULATORY AUTHORITY

Implementation of the Federal)	
Communications Commission's)	Docket No. 03-00527
Triennial Review Order – 9 Month)	
Proceeding – Loop and Transport)	

**MCI's SECOND SUPPLEMENTAL RESPONSES TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES (Nos. 1-13)**

MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc and MCI WorldCom Communications, Inc ¹ (hereinafter collectively referred to as "MCI"), hereby files the following supplemental responses to BellSouth Telecommunications, Inc 's ("BellSouth") First Set of Interrogatories MCI's initial responses and objections were filed with the Tennessee Regulatory Authority on November 26, 2003 and supplemental responses were filed with the Tennessee Regulatory Authority on December 15, 2003 (collectively "MCI's Responses") The second supplemental responses are made subject to the objections contained in MCI's Responses Pursuant to the protective agreement between BellSouth and MCI, MCI has provided certain confidential information identified below to BellSouth

INTERROGATORY 1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i e , any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 2 51 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair Answer this question in the affirmative if you are self-providing such facilities For purposes of this question, you "own" transport

¹ Brooks Fiber Communications of Tennessee, Inc and the local exchange operations of MCI WorldCom Communications, Inc will be merged into MCImetro Access Transmission Services, LLC on or about January 2, 2003

facilities if (i) you have legal title to the facility, or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Form for Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI's SECOND SUPPLEMENTAL RESPONSE Without waiving its objections to this interrogatory, MCI amends Statement No. 1 in Attachment C originally filed with the Tennessee Regulatory Authority on November 26, 2003.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

INTERROGATORY 8. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Sample Response Form – Question 8 Self-provided facilities for providing retail service									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI's SECOND SUPPLEMENTAL RESPONSE: In addition to its previous response, and subject to, and without waiving its objections as previously made, MCI states that it does not provide dark fiber service.

Response provided by: Objections provided by Counsel. Substantive response provided

by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328

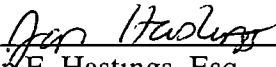
INTERROGATORY 12. For each state in Questions 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying

- a The RSAG valid address of each customer location
- b The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc , from which the loop is extended to the customer location (Provide the full 11-character CLLI)
- c Indicate whether the facility is wholly owned by you (yes, No), if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities
- d Indicate whether the facilities is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No)
- e Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location (Yes, No, NA) This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intrabuilding wire as the ILEC If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions

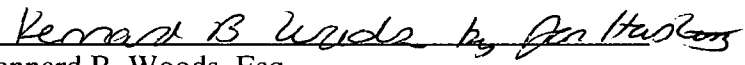
MCI's SECOND SUPPLEMENTAL RESPONSE: In addition to its previous response, and subject to, and without waiving its objections as previously made, MCI states that it does not provide dark fiber service, and MCI attaches an updated list of customer locations as Confidential Attachment B.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328

Respectfully submitted this 11th day of February, 2004



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**ATTACHMENT B to MCI's Second Supplemental
Responses to BellSouth's First Set of Interrogatories**

Docket 03-00527

PROPRIETARY AND CONFIDENTIAL

**ATTACHMENT C to MCI's Second Supplemental
Responses to BellSouth's First Set of Interrogatories**

Docket 03-00527

PROPRIETARY AND CONFIDENTIAL